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December 3, 2013

The Honorable Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

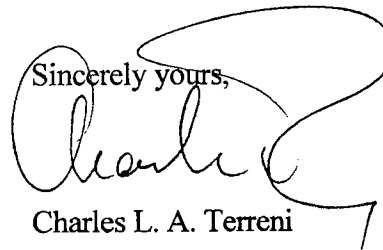
IN RE: Docket No.: 2013-392-E – Joint Application of Duke Energy Carolinas, LLC and North Carolina Electric Membership Corporation for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 750 MW Combined Generating Plant near Anderson, SC

Dear Ms. Boyd:

Enclosed please find for filing, in reference to the above matter, a Petition to Intervene on behalf of the Electric Cooperatives of South Carolina, Inc. and Central Electric Power Cooperative, Inc. along with a Certificate of Service to all applicable parties.

If you have any questions, or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely yours,



Charles L. A. Terreni

CLAT:dc

Enclosures: Cover Sheet
Petition to Intervene
Certificate of Service

cc: Michael N. Couick, Esquire
Ronald J. Calcaterra
Scott Elliott, Esquire
Alvin A. Taylor
Duane Parrish
Jacquelyn S. Dickman, Esquire
Len S. Anthony, Esquire
Richard M. Feathers, Esquire
Nanette S. Edwards, Esquire
Shannon B. Hudson, Esquire
Timika Shafeek-Horton, Esquire

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**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2013-201-WS

IN RE: Joint Application of Duke Energy Carolinas,)
 LLC and North Carolina Electric Membership)
 for a Certificate of Environmental)
 Compatibility and Public Convenience and)
 Necessity for the Construction and Operation)
 of a 750 MW Combined Generating Plant Near)
 Anderson, SC)

**PETITION TO INTERVENE ON BEHALF OF
CENTRAL ELECTRIC POWER COOPERATIVE, INC.
AND
THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC.**

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission’s Rules of Practice and Procedure, Central Electric Power Cooperative, Inc. (“Central”) and The Electric Cooperatives of South Carolina, Inc. (“ECSC”) (jointly referred to as the “Petitioners”) hereby file this Petition to Intervene in the above-captioned proceeding. Petitioners state as follows:

1. Duke Energy Carolinas, LLC (“DEC”), and the North Carolina Electric Membership Association (“NEMA”) (collectively referred to as “Applicants”) submitted an Application to the Commission for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 750 MW Combined Generating Plant Near Anderson, South Carolina (“the facility”).
2. The Commission established the above captioned docket to consider the above referenced Application.
3. Central is a generation and transmission electric cooperative formed under S.C.

Code 33-49-10, *et. seq.* Central's principal place of business is 121 Greystone Boulevard, Columbia, South Carolina, 29202. Central's mailing address is P.O. Box 1455, Columbia, South Carolina 29202. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the state of South Carolina. Central's distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.

4. The ECSC is a South Carolina not-for-profit corporation with member electric cooperatives organized in the State of South Carolina. ECSC serves as a legal and regulatory representative of its member electric cooperatives. ECSC's principal place of business is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

5. Central is a customer of the DEC. On December 21, 2009, Central and DEC entered in to a Power Purchase Agreement ("PPA") providing Central native load priority. Beginning January 1, 2013, DEC began to serve five of Central's member cooperatives located within DEC's Balancing Authority Area. By 2019, approximately twenty-five percent of Central's load, approximately 1000 MW, will be provided by DEC.

6. Central is also a customer of the South Carolina Public Service Authority ("Santee Cooper"). Central purchases its remaining power from Santee Cooper, which has an ownership interest in the V.C. Summer Nuclear Units 2 and 3 under construction in Jenkinsville, South Carolina.

7. The member cooperatives of the ECSC are customers of Central, and are directly affected by its power purchasing contracts.

8. As acknowledged in its application and its 2013 Integrated Resources Plan

filed with the North Carolina Public Utilities Commission, DEC is negotiating the acquisition of an ownership interest in the new nuclear generating units at the V.C. Summer site.

9. Petitioners anticipate that this proceeding, which involves DEC's proposal to construct additional baseload generation capacity will address a variety of issues directly related to their core business, including, but not limited to, wholesale and retail rates throughout the region, the availability and pricing of future wholesale power purchases, and DEC's commitment to regional generation ownership, specifically, V.C. Summer Nuclear Units 2 and 3, which is in furtherance of the position expressed by the Commission in Order No. 2011-454 (Docket No. 2011 20-E).

10. Petitioners are concerned with the impact of the proposed facility on DEC's ongoing negotiations to purchase an ownership interest in the new nuclear generation units at the V.C. Summer Site, negotiations which were expressly encouraged by the Commission's in Order No. 2011-454.

11. As customers of DEC and Santee Cooper Petitioners have an interest in the Commission's determination of the basis of the need for the proposed facility, whether it will serve the interests of system economy, and whether public convenience and necessity require the construction of the facility.

12. Petitioners therefore have a direct and material interest in the issues to be addressed and resolved by the Commission. Moreover, Petitioners interests cannot be represented adequately by any other party and Petitioners involvement in these proceedings will promote the public interest.

13. Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they will be allowed to intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as a party, engage in discovery and participate in all hearings by offering testimony and exhibits, and cross-examining witnesses. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff

Respectfully submitted,

TERRENI
LAW FIRM, LLC

Digitally signed by Charles L.A. Terreni
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BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2013-392-E

IN RE: Joint Application of Duke Energy Carolinas,)
 LLC and North Carolina Electric Membership)
 for a Certificate of Environmental)
 Compatibility and Public Convenience and)
 Necessity for the Construction and Operation)
 of a 750 MW Combined Generating Plant Near)
 Anderson, SC)

**CERTIFICATE
OF
SERVICE**

The undersigned, Charles L. A. Terreni, Esquire, does hereby certify that he has served the below-listed parties with a copy of a **PETITION TO INTERVENE OF THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC. AND CENTRAL ELECTRIC POWER COOPERATIVE, INC.** in the above referenced matter by placing a copy in the U. S. Mail to them at the address(es) listed below.

Parties Served:

Representing:

Alvin A. Taylor
Director
SC Dept. of Natural Resources
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Columbia, SC 29202

SC Dept. of Natural Resources

Duane Parrish
Director
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Duke Energy Carolinas, LLC

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Charles L. A. Terreni

December 3, 2013
Columbia, SC